REMARKS

1. Claims 1-4, 6-12 and 15-23 are not anticipated by Matsuura et al. (US Patent Pub. No. 2004/0196266) ("Matsuura") under 35 U.S.C §102(e).

Claim 1 recites an apparatus for handwriting recognition, the apparatus comprising a touch-sensitive display screen providing a handwriting input area capable of detecting a handwritten user input; and a processing device configured to interpret the handwritten user input as a symbol from a plurality of predefined symbols, wherein the handwriting input area includes a writing start area, and wherein said writing start area is substantially smaller than said handwriting input area, wherein the processing device is configured to provide a visual indication of said writing start area on said display screen, and wherein the processing device is configured to interpret the user input as a symbol only if the user input starts within said writing start area, the user input ending anywhere within the handwriting input area. This is not disclosed or suggested by Matsuura. Matsuura fails to disclose that the handwriting input area includes a writing start area and further, that the processing device is configured to interpret the user input as a symbol only if the user input starts within said writing start area, the user input ending anywhere within the handwriting input area.

Matsuura relates to a character input apparatus which includes a key-in unit configured to input a character by a keystroke, a first character input by the key-in unit and a second character input by the writing input unit in form of a single character string including the first character and the second character.

Matsuura comprises a touch-sensitive display (Fig. 1 item 2). With references to items 241, 242, 243, 244 in Fig. 1 of Matsuura the Examiner states that the touch-sensitive display of Matsuura comprises a writing start area. The software key 241 is not a "writing start area" as recited by Applicant in the claims. Matsuura states, in paragraph [0023] that the items 241, 242, 243, 244 of Fig. 1 represent "software keys". There is

no disclosure that items 241, 242, 243, 244 represent a "writing start area" as claimed by Applicant.

Applicant's claimed subject matter provides a solution to determining whether a stylus for input on a touch-sensitive display screen is used as a logical mouse or as a logical pen. For instance, when used as a logical mouse, a user can scroll the scroll bars of a menu. When used as a logical pen, a user can enter symbols such as capital letters or small letters. In order for the stylus to act as a logical pen, a user must **start to write** a symbol **inside a "writing start area"**, that is smaller than a handwriting input area, but may **finish the symbol anywhere within the handwriting input area, including outside of this writing start area**. Thus, a single symbol can have some parts inside the writing start area and some parts outside of this area. The handwriting input area is advantageously much larger than the writing start area, and can be essentially the entire display screen. As an example, menu items can be placed inside the handwriting input area, which in logical pen mode are not affected by the stylus, that is, the menu functions does not work as long as the logical pen mode is enabled. This is clearly **not** what Matsuura discloses.

Matsuura discloses, in paragraph [0025] that the "software keys" 241-244 are placed at peripheral positions not to overlap the "screen central part" which functions as both a character display area and a handwriting area. Matsuura clearly distinguishes the "software keys" 241, 242, 243, 244 from the handwriting area. The "software keys" of Matsuura are assigned to various "sentence input" functions. [0025]. The "functions" for dynamic sentence input can be assigned to these software keys 241 to 244 in Matsuura are indicated as being insertion of a space, insertion of a line feed, deletion of characters. [0025]. The software keys 241-244 are only displayed when the input mode is switched to the handwriting input mode. (see e.g. paragraphs [0057. 0064, 0066, 0067]). Software keys 241, 242, 243, 244 of Matsuura do not represent or correspond to the "writing start area" as is claimed by Applicant.

Claim 1 also recites that the processing device is configured to interpret the user input as a symbol only if the user input starts within the writing start area and ends anywhere within the handwriting input area. This is not disclosed or suggested by Matsuura. In Matsuura, cursor movement keys 231-234 control the movement of the cursor in upper, lower, right and left directions. (para [0024].) Paragraph [0025] merely states that the software keys 241-244 are displayed at predetermined positions in an outer peripheral portion of the screen. Various functions used for dynamic sentence input can be assigned to these software keys. There is no disclosure here or elsewhere in Matsuura disclosing that a user input is interpreted as a symbol "only if the user inputs starts within the writing start area and ends anywhere within the handwriting input area" as is recited by Applicant in the claims.

Since each element recited by Applicant in claim 1 is not disclosed or suggested by Matsuura, claim 1 cannot be anticipated. Claim 17 should also be allowable for similar reasons. Claims 2–4, 6–12 and 15, 16 and 18–23 should be allowable at least by reason of their respective dependencies.

Claim 2 recites that the processing device is configured to interpret the user input as a user interface control operation and not as a symbol if the user input starts outside of the writing start area. This is not disclosed or suggested by Matsuura. Paragraph 0028 states that the coordinate determination unit determines a position pressed by a user on a display area of the display device. The coordinate determination unit outputs the coordinate value to the software control unit, a handwriting acquisition unit or the candidate selection unit in accordance with the determined position. Paragraph 0029 states that the software key control unit controls the display erasure of the software keys on the display device. The software key control unit determines which software key was pressed based on the coordinate value supply from the coordinate determination unit. The software key control unit outputs data corresponding to the pressed software key to the character input control unit as a user request. However nothing here discloses or suggests that the user input is interpreted as a user interface control operation and not as a symbol if the user input starts outside of the writing start

area, as is recited by Applicant in the claim. Thus, claims 2 and 18 cannot be anticipated.

Claim 3 recites that the processing device is further configured to interpret the user input as a user interface control operation and not as a symbol if a pen down event within the writing start area is not followed by a pen move event within a prescribed time period. Paragraphs 0045-0046 state that the coordinate determination unit detects the interruption of pressing and notifies it to the handwriting acquisition unit. The handwriting acquisition unit judges the end of one stroke of writing input from this notification and activates a timer. When the next pressing is carried out before the timeout of the timer, the handwriting acquisition unit assumes that the input of one character is yet to be finished and continuously accepts input. When the timeout of the time recurs, the handwriting acquisition unit assumes that the input handwriting as one character and supplies it to the character recognition unit as one set of handwriting data. Thus, Matsuura merely makes a determination as to whether the inputting of a character is assumed to be complete, or not, based on the timer. This is not the same as interpreting a user input as a user interface control operation and not as a symbol independent event within the writing start area is not followed by a pen movement within a prescribed time period as claimed by Applicant. Thus, claims 3 and 19 cannot be anticipated.

Claim 4 is not anticipated because the software keys 241–244 are not a "writing start" area as claimed by Applicant.

Claims 6, 7 and 20 are not anticipated because the software keys 241–244 are not a "writing start" area as claimed by Applicant. Furthermore, there is no disclosure that the position of the software keys can be adjusted depending on a cursor position. Figures 1 and 4 clearly show that the software keys 241–244 are always in the same position around the display screen.

3. Claims 13, 14, 24 and 25 are not unpatentable over Matsuura in view of Dutta et al. ("Dutta") US Patent Pub. 2004/0196266 35 U.S.C §103(a) at least by reason of their respective dependencies.

It is noted that Applicants claimed subject matter solves the problem of discriminating between a writing mode and a function mode, which enables the processing device to interpret the user input as a symbol only if the user inputs starts within the writing start area (i.e. in writing mode) and ends anywhere within the handwriting input area. By having a predetermined start area the risk of accidental mode change from writing mode to function mode and vice versa is reduced.

This problem is not addressed by Matsuura. One of skill in the art would not find any suggestions pertaining on how to distinguish between a writing mode and a function mode in view of Matsuura. Rather, Matsuura teaches to assign various functions for dynamic sentence input to a number of so-called software keys that are included in the touch sensitive display. The dynamic sentence input functionality of Matsuura is directed toward providing means for text editing. Starting with Matsuura, one of skill in the art would not be motivated to consider the problem of discriminating between a writing mode and a function mode, as is addressed by Applicant.

Dutta does not overcome any of the above noted deficiencies and one of skill in the art would not be motivated to combine Matsuura and Dutta to achieve Applicant's claimed subject matter. Dutta merely discloses means for customizing a touch screen keyboard (see figures 5–10 of Dutta). In Dutta, the user is allowed to customize the touch screen keyboard by rearranging the keys of an input touch screen keyboard. Dutta discloses that the letters are presented alphabetically in a U-shape. (see e.g. Col. 3, lines 57-62). However, one of skill in the art would not be motivated to consider a solution to the problem of discriminating between a writing mode and a function mode, or to even have a handwriting input area which includes a writing start area, when looking at Matsuura and Dutta, and the combination thereof, since neither Matsuura or Dutta even touches on this particular topic or problem.

Additionally, Matsuura and Dutta are non-analogous art and may not be combined for purposes of 35 U.S.C.§103(a). References may be combined under 35 U.S.C. §103(a) only if the references are analogous art. A reference is analogous art if the reference is in the same field of endeavor as the applicant's, or the reference is reasonably pertinent to the particular problem with which the applicant was concerned. As noted above, Matsuura relates to a character input apparatus which includes a key-in unit configured to input a character by a keystroke, a first character input by the key-in unit and a second character input by the writing input unit in form of a single character string including the first character and the second character. Matsuura assigns various functions for dynamic sentence input to a number of so-called software keys that are included in the touch sensitive display. The dynamic sentence input functionality of Matsuura is directed toward providing means for text editing.

Dutta merely discloses means for customizing a touch screen keyboard and that the user is allowed to customize the touch screen keyboard by rearranging the keys of an input touch screen keyboard.

Neither Matsuura nor Dutta are directed to, or even remotely address, the problem of distinguishing between a writing mode and a function mode, or having a handwriting input area that includes a writing start area. Thus, neither Matsuura nor Dutta are in the same field of endeavor as Applicant or reasonably pertinent to the particular problem with which Applicant is concerned.

Thus, the combination of Matsuura and Dutta does not disclose or suggest each element recited by Applicant in the claims, one of skill in the art would not be motivated to make the combination and the references are not analogous for purposes of 35 U.S.C. §103(a). Therefore, a *prima facie* case of obviousness under 35 U.S.C. §103(a) cannot be established.

The Commissioner is hereby authorized to charge any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

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